

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
OFFICE OF THE CONSUMER ADVOCATE WITNESS WILLETTE
(USPS/OCA-T7-24-29)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to OCA witness Willette: USPS/OCA-T7-24-29.

Respectfully submitted,

UNITED STATES POSTAL SERVICE


By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Michael T. Tidwell

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June 19, 2000

USPS/OCA-T7-24.

Please refer to your testimony at page 7, lines 5-7. Do you consider unit price per transaction to be the primary factor affecting whether consumers employ electronic bill payment instead of using the mail. If so, please provide the basis for your opinion?

USPS/OCA-T7-25.

At page 7, line 16, of your testimony, you claim that "underpayment of [First-Class Mail] postage does not appear to be a problem" because overpaid revenue is greater than shortpaid revenue by 204.6 million dollars.

- (a) Is it your testimony that the Postal Service should make no effort to enforce applicable rates for First-Class Mail if the total amount overpaid on some pieces in that class exceeds the total amount underpaid on other pieces?
- (b) In your view, how much postage underpayment on First-Class Mail pieces should the Postal Service tolerate?
- (c) With respect to underpaid postage, to which mail users should the Postal Service be more lenient?
- (d) In your view, how much postage underpayment on First-Class Mail pieces has to occur before the Postal Service has a problem with postage underpayment?

USPS/OCA-T7-26.

Would you describe Qualified Business Reply Mail as "a program where creditors and other business correspondents provide postage paid envelopes for customers?"

USPS/OCA-T7-27.

Please refer to your testimony at page 15, lines 1-5. Do you regard these statements as consistent with the findings of Docket No. R97-1 witness Ellard (USPS-RT-14; Tr. 35/19083) that 60 percent of consumers would prefer a "one-stamp" system. If you do not, please explain.

USPS/OCA-T7-28.

Please refer to your testimony at page 19, footnote 37. Provide all support for your belief that customers who are provided with "accurate, clean prebarcoded envelope[s]" would choose to lay them aside in order to use a hand-addressed envelopes instead.

USPS/OCA-T-29.

- (a) On percentage basis, please provide your best estimate of the number household mailers currently aware of the rate of postage required to be paid on a standard one-ounce First-Class Mail piece. Please describe the basis for your estimate and provide any documents generated in connection with the development of that estimate.
- (b) On percentage basis, please provide your best estimate of the number household mailers currently aware of the rate of postage required to be paid for a standard one-ounce QBRM piece. Please describe the basis for your estimate and provide any documents generated in connection with the development of that estimate.